

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

vs.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941-BB/LFG

RIO CHAMA STREAM SYSTEM

Section 7  
Jicarilla Apache Nation

**JOINT MOTION FOR EXTENSION OF TIME**

The Plaintiff State of New Mexico, *ex rel.* State Engineer, (State), Plaintiff-Intervener the United States of America (United States) and Defendant Jicarilla Apache Nation (Nation) respectfully request the Court to grant an extension of time to submit a proposed Consent Order to the Court describing the water rights of the Nation in Section 7 of the Rio Chama Stream System, as required by the *Order* filed March 15, 2012 (Doc. 10798), and in support state the following:

1. The March 15, 2012 *Order* requires the State, the United States and the Nation to submit a proposed Consent Order to the Court describing the water rights of the Nation in Section 7 by June 15, 2012.

2. Representatives of the State and the Nation have reached a tentative agreement on the terms of a Consent Order that describes the water rights of the Nation in Section 7, and the State and the Nation are in the process of proof reading the maps and technical information that will be part of that order.

3. Following the final compilation of the materials need to be included in the Consent

Order, the order will be presented to the Nation's tribal counsel for their approval. Once the Nation passes a resolution accepting the Consent Order, the order will be submitted to the United States for its review and approval.

4. The State, the United States and the Nation request an extension of time until August 15, 2012 to complete this process and to submit a proposed Consent Order to the Court for approval.

Respectfully submitted,

/s/ Ed Newville  
EDWARD G. NEWVILLE  
Special Assistant Attorney General  
Office of State Engineer  
P.O. Box 25102  
Santa Fe, NM 87504-5102  
(505) 867-7444

telephonically approved 6/14/2012  
HERBERT A. BECKER  
Attorney at Law  
2309 Renard Place SE  
Albuquerque, NM 87106  
(505) 242-2214

telephonically approved 6/14/2012  
BRADLEY S. BRIDGEWATER  
U.S. Department of Justice  
South Terrace Suite 370  
999 18<sup>th</sup> Street  
Denver, CO 80202  
(303) 844-1359

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 14<sup>th</sup> day of June, 2012, I filed the foregoing electronically through the CM/ECF system which caused the parties on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail.

/s/ Ed Newville  
EDWARD G. NEWVILLE